COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Valley Proteins, Inc.
151 Val-Pro Road
P.O. Box 3588
Winchester Virginia
Permit No. VRO80144

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Valley Proteins, Inc. has applied for a renewal Title V Operating Permit for its Linville facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:

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Air Permit Manager:_____ Date:

Sharon G. Foley, P.E.

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Larry M. Simmons, P.E.

FACILITY INFORMATION

Permittee
Valley Proteins, Inc.
151 Val-Pro Road
P.O. Box 3588
Winchester, Virginia 22604

Facility
Valley Proteins, Inc. – Linville
6230 Kratzer Road
Linville, Rockingham County, Virginia

ID No.: 51-165-0023

SOURCE DESCRIPTION

SIC Code 2077 – Rendering of animal by-products and fats
NAISC 311613 – Rendering & Meat Byproduct Processing

Valley Proteins, Inc. (VP) renders inedible animal by-products and surplus restaurant fats to produce protein solids and fats which are sold to feed mills. One 22.5 ton/hr and one 15 ton/hr continuous cookers, five 1.75 ton/hr feather cookers, two 3.50 ton/hr feather cookers and two 0.75 ton/hr eggshell cookers breakdown and dehydrate raw animal materials into solids and fats using steam from four residual oil-fired boilers and one distillate oil-fired boiler. One 10.0 ton/hr feather dryer is also used in the operation. Particulate matter, volatile organic compound, and odor emissions are controlled by a Venturi scrubber and three residual oil-fired boilers. Fats and solids are stored in fat tanks and feed bins, respectively.

The facility is a PSD and Title V major source of SO2. This source is located in an attainment area for all pollutants. The facility was previously permitted under minor NSR permits, issued on September 3, 1974, October 23, 1992, and April 6, 2001.

CHANGES TO EXISTING TITLE V PERMIT

Only minor changes have been made to the Title V permit. First, the condensers were redefined to be inherent to the rendering process rather than add-on control equipment. Additionally, a minor change was made to the periodic monitoring inspection for the boilers and the rendering equipment which gives

the permittee the option of taking timely corrective action so that the stack operates with no visible emissions in lieu of an EPA Method 9 evaluation.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted (August 20, 2003). In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Table I. Significant Emission Units

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device Description (PCD)	PCD ID	Pollutants Controlled	Applicable Permit Date
Fuel Burning Equipment							
B-1	B1E-1	Cleaver Brooks CB400-700 boiler, manufactured in 1974	29.291 MMBtu/hr maximum heat input	---	---	---	09/03/74 04/06/01
B-2	B2E-1	Cleaver Brooks CB400-700 boiler, manufactured in 1974	29.291 MMBtu/hr maximum heat input	---	---	---	09/03/74 04/06/01
B-3	B3E-1	Cleaver Brooks CB400-700 boiler, manufactured in 1974	29.291 MMBtu/hr maximum heat input	---	---	---	09/03/74 04/06/01
B-4	B4E-1	Superior 4-S-3004 stand-by boiler, manufactured in 1973	9.3 MMBtu/hr maximum heat input	---	---	---	04/06/01
B-5	B5E-1	Cleaver Brooks CB200 boiler, manufactured in 1974	8.389 MMBtu/hr maximum heat input	---	---	---	04/06/01
Rendering Process Equipment							
CC-1	ACCE-2	Dupps 320U continuous cooker equipped with an entrainment tank and a Pitcock air cooled condenser, Model#100 and an ACC 300 air cooled condenser, Model # ACC300, manufactured in 1988 **	22.5 tons/hr maximum solids input	---	---	---	---
	OR	OR					
	B1E-1 B2E-1 B3E-1	Dupps 320U continuous cooker equipped with an entrainment tank and a Strothers Wells Corporation shell & tube condenser Serial # S-12897F, manufactured in 1988		Venturi scrubber and Cleaver Brooks boilers with firebox manufactured by AC Corporation	VS1 B-1 B-2 B-3	PM PM-10 VOC	

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device Description (PCD)	PCD ID	Pollutants Controlled	Applicable Permit Date
CC-2	DCCE-1	Dupps 1200 continuous cooker equipped with an entrainment tank and a Dupps direct contact condenser, 900 gpm, Serial # L-42849-1, manufactured in 1977	15 tons/hr maximum solids input	---	---	---	---
FC1-5	DCCE-1	Dupps 5x12 feather cookers equipped with an entrainment tank and a Dupps direct contact condenser, 900 gpm, Serial # L-42849-1, manufactured in 1972-1976	1.75 tons/hr maximum solids input each	---	---	---	---
FC-6,7	DCCE-1	Dupps 5x16 feather cookers equipped with an entrainment tank and a Dupps direct contact condenser, 900 gpm, Serial # L-42849-1, manufactured in 1974	3.5 tons/hr maximum solids input each	---	---	---	---
EC-1,2	DCCE-1	Dupps 4x16 eggshell cookers equipped with an entrainment tank and a Dupps direct contact condenser, 900 gpm, Serial # L-42849-1, manufactured in 1976	0.75 tons/hr maximum solids input each	---	---	---	---
FD-1	B-1,2,3	Davenport feather dryer equipped with an entrainment tank and Cooling Products Inc. A-frame air cooled condenser, Model # 111-6000, manufactured in 1982	10.0 tons/hr maximum combined solids input (5.4 tons/hr feather meal product output at 10% moisture)	Venturi scrubber and Cleaver Brooks boilers with firebox manufactured by AC Corporation	VS1 B-1 B-2 B-3	PM PM-10 VOC	10/23/92

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

****** This scenario is only used when water is not available to operate the Strothers Wells Corporation shell & tube condenser.

EMISSIONS INVENTORY

A copy of the 2003 CEDS emissions report is attached. Emissions are summarized in the following tables.

Table II. 2003 Actual Emissions

	2003 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO_2	PM_{10}	NO_x
Boilers 1-5	0.28	5.13	261.26	15.96	54.81
Rendering Equipment	6.74			1.62	
Total	7.02	5.13	261.26	17.58	54.81

Insignificant amounts of hazardous air pollutants are emitted from fuel burning and have not been included in the inventory.

EMISSION UNIT APPLICABLE REQUIREMENTS - Fuel Burning Equipment (B1-B5)

Limitations

The following limitation is a requirement from the minor NSR permit issued on September 3, 1974. A copy of the permit is included as Attachment B.

No Condition No.: Approved fuels for the Cleaver Brooks boilers (Units B-1, B-2, and B-3) are residual oil and natural gas.

The following limitation is a requirement from the minor NSR permit issued on October 23, 1992. Please note that the condition number is from the 1992 permit; a copy of the permit is included as Attachment C.

Condition 8: Visible emission limit of 20% for the Cleaver Brooks boilers (Units B-1, B-2, and B-3) when burning residual oil and natural gas.

The following limitations are requirements from the minor NSR permit issued on April 6, 2001. Please note that the condition numbers are from the 2001 permit; a copy of the permit is included as

Attachment D.

Condition 3: Processed animal fat is an approved fuel for the boilers (Units B-1- B-5).

Condition 4: Processed animal fat fuel throughput limit for the boilers (Units B-1- B-5).

Condition 5: Requires all processed animal fat burned in the boilers (Units B-1- B-5) be derived from Valley Proteins rendering operations.

Condition 6: Requires proper operations and maintenance of the combustion equipment.

Condition 7: Hourly emissions limits for the three Cleaver Brooks boilers (Units B-1, B-2 and B-3) when burning processed animal fat.

Condition 8: Hourly emissions limits for the Superior boiler (Unit B-4) when burning processed animal fat.

Condition 9: Hourly emissions limits for the Cleaver Brooks boiler (Unit B-5) when burning processed animal fat.

Condition 10: Combined annual emissions limits for the boilers (Units B-1- B-5).

Condition 11: Visible emission limit for the boilers when burning processed animal fat.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-900 - Particulate matter emission limit for fuel burning equipment installations as determined by the equation E = 1.0906H -0.2594, where E is the emission limit in lbs/MMBTU and H is the total capacity in MMBTU/hr. The limit is 0.33 lb/MMBTU based on the combined rated heat input of 105.56 MMBTU/hr for all five boilers.

9 VAC 5-40-930 - Sulfur dioxide emission limit for fuel burning equipment installations as determined by the equation S = 2.64K, where S is the emission limit in lbs/hr and K is the total heat input capacity in MMBTU/hr. The limit is 278.7 lb/hr based on the combined rated heat input of 105.56 MMBTU/hr for all five boilers.

9 VAC 5-50-80 - Visible emission limit for fuel burning equipment (Units B-4 and B-5) shall not exceed twenty percent (20%) opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty percent (30%) opacity.

The following additional requirements have been included to demonstrate compliance with the

particulate matter, sulfur dioxide, and visible emission limits:

9 VAC 5-80-110 - The maximum sulfur content of the residual oil shall not exceed 2.5% by weight per shipment.
9 VAC 5-80-110 - The maximum sulfur content of the distillate oil shall not exceed 0.5% by weight per shipment.

9 VAC 5-80-110 - Approved fuels for boiler B-5 are distillate oil and natural gas.

Periodic Monitoring and Recordkeeping

This permit includes requirements for monitoring and recordkeeping to satisfy Part 70 requirements. Additionally, the monitoring and recordkeeping requirements in Condition 15 of the NSR permit dated April 6, 2001 have been modified to meet Part 70 requirements.

Opacity has been chosen as a surrogate indicator for particulate matter emissions. The permittee will perform weekly inspections of the boiler stacks to determine the presence of visible emissions. If during the inspection, visible emissions are observed, the permittee has the option of either taking timely corrective action so that the stack operates with no visible emissions (the permittee must initiate corrective action within 4 hours and return to no visible emissions within 24 hours of the inspection) or conducting an EPA Method 9 (40 CFR Part 60, Appendix A) visible emission evaluation (VEE). The VEE will be conducted for a minimum of six minutes. If any of the observations exceed the applicable opacity limit, the observation period will continue for a total of 60 minutes of observation or until a violation of the opacity standard is recorded.

If the results of the VEE exceed the opacity standard, the permittee is required to do a particulate matter performance test within 90 days of the exceedance. No more than one test per year per boiler is required as long as the performance test results do not exceed the particulate matter emission limit. A concurrent VEE is required with the performance test.

When burning fuels other than processed animal fat, the particulate matter emission limit of 0.33 pound per million Btu input applies to the combined capacity of the boilers (105.56 MMBtu/hr). This is equal to 34.83 lb/hr. Potential particulate emissions from the operation of all five boilers (B-1 to B-5) combined using AP-42 emission factors are shown in the following table.

Table III. Particulate Emissions

Fuel Type	Capacity of Fuel Burning Equipment	Maximum Hourly Throughput	AP-42 Emission Factor for PM (lb/1000 gal)	Maximum Sulfur Content (S)	Maximum Emissions of PM (lb/hr)	Calculated PM Emission Standard (lb/hr)

Fuel Type	Capacity of Fuel Burning Equipment	Maximum Hourly Throughput	AP-42 Emission Factor for PM (lb/1000 gal)	Maximum Sulfur Content (S)	Maximum Emissions of PM (lb/hr)	Calculated PM Emission Standard (lb/hr)
Residual Oil	97.22 MMBtu/hr	0.648 mgal/hr	9.19 S + 3.22	2.5	16.98	
Distillate Oil	8.389 MMBtu/hr	0.0061 mgal/hr	2.0	NA	0.12	
Total					17.10	34.83

The maximum expected particulate emissions using the EPA AP-42 emissions factor is less than half of the allowable limit. Therefore, there is reasonable assurance that the particulate matter emission limit will not be violated as long as the fuel sulfur content and the opacity limit are not exceeded. Boiler inspection reports have revealed no past violations of the opacity limitations contained in this permit.

When burning fuels other than processed animal fat, the allowable sulfur dioxide emission limit for all five boilers combined equals 278.7 lbs/hr. The AP-42 emission factor for sulfur dioxide assumes that all of the sulfur is converted to sulfur dioxide. The maximum sulfur dioxide emissions from the boilers are included in the following table.

Table IV. Sulfur Dioxide Emissions

Fuel Type	Capacity of Fuel Burning Equipment	Maximum Hourly Throughput	AP-42 Emission Factor for Sulfur Dioxide (lb/1000 gal)	Maximum Sulfur Content (S)	Maximum Emissions of Sulfur Dioxide (lb/hr)	Sulfur Dioxide Emission Standard (lb/hr)
Residual Oil	97.22 MMBtu/hr	0.648 mgal/hr	157 S	2.5	254.39	
Distillate Oil	8.389 MMBtu/hr	0.0061 mgal/hr	142 S	0.5	4.32	
Total					258.71	278.7

Since the AP-42 emission factor assumes that all of the sulfur in the fuel is converted to sulfur dioxide when burning residual oil or distillate oil, the sulfur dioxide emission limit can not be exceeded as long as the sulfur content of the fuel does not exceed 2.5% for residual oil and 0.5 % for distillate oil. The permittee is required to obtain a certification from the fuel supplier with each shipment of residual oil and distillate oil. The certification must include the name of the fuel supplier, the date the oil was received, the volume of oil delivered in the shipment, and the sulfur content (in percent) of the residual oil and distillate oil. The permittee is required to retain the fuel certifications.

Actual particulate matter and sulfur dioxide emissions from the operation of the five boilers when burning residual or distillate oil will be calculated using the following equations:

For residual oil combustion:

$$E = F \times O$$

.....Equation 1

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factors as follows:

PM = 9.19 S + 3.22 lb/1000 gal (S = weight percent sulfur)

SO_2 = 157 S lb/1000 gal (S = weight percent sulfur)

O = residual oil consumed (1000 gal/time period)

For distillate oil combustion:

$$E = F \times O$$

.....Equation 2

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factors as follows:

PM = 2.0 lb/1000 gal

SO_2 = 142 S lb/1000 gal (S = weight percent sulfur)

O = distillate oil consumed (1000 gal/time period)

Calculations for maximum hourly emissions have been included in Attachment E.

When burning processed animal fat, the following equation and emission factors shall be used to calculate actual emissions to determine compliance with the hourly and annual limits contained in Conditions III.A 10 through III.A.13 of the permit.

$$E = F \times O$$

..... Equation 3

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factors as follows:

Pollutant	Emission Factor	Emission Factor Units
PM	2.0	
PM-10	2.0	
NOX	38.0	lbs/10^3 gallons
CO	0.45	
VOC	1.8	

O = Processed animal fat consumed (1000 gal/time period)

Fuel testing for processed animal fat has shown negligible amounts of sulfur in the fuel. Therefore no sulfur monitoring is required for processed animal fat.
The hourly emission limits for each boiler were established based on burning processed animal fat when operating at capacity. The annual emission limits for the combined operation of the five boilers are based on the annual throughput limit of 2.0 million gallons of processed animal fat. Therefore, as long as the fuel throughput limit for processed animal fat is not exceeded, there should not be a violation of the hourly or annual emission rates. Calculations have been included in Attachment E to demonstrate how the limits were established.

The permittee will keep records of monthly and annual throughput of each type of fuel, fuel supplier certifications, DEQ approved pollutant-specific emission factors and equations used to demonstrate compliance with emission limits, fuel specification test results for processed animal fat, weekly inspection log, results of all VEEs and performance tests, written operating procedures, maintenance schedules for the boilers, and operator and training procedure records.

Compliance Assurance Monitoring (CAM)

None of the fuel burning equipment (Units B-1- B-5) have add-on control equipment and are therefore not subject to CAM.

Testing

The permit requires stack testing for particulate matter if there is a violation of the opacity standard. Additionally, DEQ can request additional visible emission evaluations on the boilers. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included in the permit for the fuel burning operations.

Streamlined Requirements

The following conditions in the April 6, 2001 NSR permit have not been included for the reasons provided:

Condition 12, Visible Emission Evaluation: On November 5, 2002 Valley Proteins submitted a notification that the VEE will be performed immediately. December 16, 2002 DEQ received a copy of the test results, and compliance staff determined this requirement has been successfully fulfilled.

Condition 14, Initial Notifications: Anticipated date of the VEE was received by the DEQ on November 5, 2002.

Additionally, the 10% opacity limit for the boilers when burning processed animal fat is more stringent than the Virginia Administrative Code Standard for visible emissions, 9 VAC 5-50-80. Therefore, only the more stringent opacity limit was included in the permit.

The 20% opacity limit with no six minute deviation for the boilers (Units B-1, B-2, B-3) is more stringent than the Virginia Administrative Code Standard for visible emissions, 9 VAC 5-50-80. Therefore, only the more stringent 20% opacity with no six minute deviation was included in the permit.

EMISSION UNIT APPLICABLE REQUIREMENTS - Rendering Equipment

Limitations

The following limitations are state BACT requirements from the minor NSR permit issued on October 23, 1992. Please note that the condition numbers are from the 1992 permit; a copy of the permit is included as Attachment C.

Condition 3: Particulate matter emissions from the feather dryer (Unit FD-1) shall be controlled with a Venturi scrubber with a design efficiency of 98%.

Condition 4: Volatile organic compound and odor emissions from the feather dryer (Unit FD-1) equipped with a condenser shall be controlled by a boiler firebox.

Condition 7: Throughput limits for the feather dryer (Unit FD-1).

Condition 14: Requires development of maintenance schedule and inventory of spare parts for air pollution control equipment.

Condition 15: Requires written operating procedures for air pollution control equipment and for operator training.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-260: Particulate matter process weight limit for process units apply to the rendering equipment. The limit is determined by the equation $E = 4.10 P^{0.67}$, where E is the particulate limit in pounds per hour and P is the process weight limit in tons per hour.

9 VAC 5-50-80: Visible emission limit for the condenser stacks (ACCE-2, ACCE-3, DCCE-1) shall not exceed twenty percent (20%) opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty percent (30%) opacity.

The following additional requirements have been included to demonstrate compliance with the particulate matter and visible emission limits:

9 VAC 5-80-110: Particulate matter, volatile organic compound, and odor emissions from the continuous cooker (Unit CC-1) equipped with entrainment tanks and condensers are controlled b a Venturi scrubber and a boiler firebox in series.

Monitoring and Recordkeeping

The monitoring and recordkeeping requirements in Conditions 3 and 10 of the minor NSR permit dated October 23, 1992 have been modified to meet Part 70 requirements.

The permit requires operation of a Venturi scrubber to demonstrate compliance with the particulate matter process weight limit and the visible emission requirements. Properly operating control equipment can comply with the particulate matter process weight limits as shown in the following table.

Unit	Process Rate (tons/hr)	Allowable Limitation (lbs/hr)	Potential Controlled Emissions (lb/hr)
CC-1	22.5	33.02	16.47
CC-2	22.5	33.02	5.88
FC-1	1.75	5.97	0.10
FC-2	1.75	5.97	0.10
FC-3	1.75	5.97	0.10
FC-4	1.75	5.97	0.10
FC-5	1.75	5.97	0.10

EC-6	3.50	9.49	0.12
EC-7	3.50	9.49	0.12
EC-1	0.75	3.38	0.12
EC-2	0.75	3.38	0.12
FD-1	10.00	19.18	0.13

As demonstrated by the above comparison, permit limitations for particulate matter cannot be violated if Valley Proteins operates the required air pollution control device. Also, past inspection reports concerning opacity requirements have revealed no violations of the opacity limitations contained in this permit. Based on the inspection data, there is little likelihood of violating the opacity limitation. Therefore, as long as the rendering equipment and the associated controls are operated properly it can reasonably be assumed that the opacity limitation will not be violated.
Weekly inspections are required for the Venturi scrubber and on the condenser stacks. The inspection will include an observation of the pressure drop and flow across the Venturi scrubber and a determination of the presence of visible emissions on the condenser stacks. If during the inspection, visible emissions are observed, the permittee has the option of either taking timely corrective action so that the stack operates with no visible emissions (the permittee must initiate corrective action within 4 hours and return to no visible emissions within 24 hours of the inspection) or conducting an EPA Method 9 (40 CFR Part 60, Appendix A) visible emission evaluation (VEE). The VEE will be conducted for a minimum of six minutes. If any of the observations exceed the applicable opacity limit, the observation period will continue for a total of 60 minutes of observation or until a violation of the opacity standard is recorded.

Valley Proteins will be required to keep records on process throughputs, weekly inspection results, manufacturer's specifications for the Venturi scrubber, maintenance, and training.

Compliance Assurance Monitoring (CAM)

Only Units CC-1 and FD-1 are equipped with add-on control equipment and the control equipment is primarily for odor control. All of the units are equipped with entrainment tanks and condensers, which are considered inherent to the process. For all units, uncontrolled particulate and volatile organic compound emissions are less than 100 tons/yr. Therefore, CAM does not apply to these units. See Attachment E

Testing

No specific testing has been included in the permit for the process operations.. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included in the permit for the process operations.

Streamlined Requirements

There are no streamlined requirements.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions. The general condition regarding asbestos requirements was not included, as there is no asbestos located at this facility.

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-50-310, Odorous Emissions.

None of these requirements have been included in the Title V permit.

FUTURE APPLICABLE REQUIREMENTS

The facility has not identified any future applicable requirements in the application. This facility is not a major source of HAPS. Therefore, this facility is not subject to any 40 CFR Part 63 NESHAP standards.

INAPPLICABLE REQUIREMENTS

The permittee has not identified any inapplicable requirements in the application.

COMPLIANCE PLAN

Valley Proteins, Inc. - Linville is currently in compliance with all federally enforceable applicable requirements. No compliance plan was included in the application or in the permit

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC5-80-720 C)
MS-1-5	five meal storge silos (66,500 cubic feet each)	9 VAC 5-80-720 B	PM and PM-10	---
SS1-2	two silage storage silos (66,500 cubic feet each)	9 VAC 5-80-720 B	PM and PM-10	---
T-1	distillate oil fuel tank (12,280 gals) Installed in 1974	9 VAC 5-80-720 B	VOC	---
T-2	residual oil fuel tank (17,626 gals) Installed in 1974	9 VAC 5-80-720 B	VOC	---
T-3	residual oil fuel tank (15,276 gals) Installed in 1974	9 VAC 5-80-720 B	VOC	---
T-4	diesel fuel storage tank (300,000 gals) Installed in 1974	9 VAC 5-80-720 B	VOC	---

[1]The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

Valley Proteins, Inc. did not submit a request for confidentiality. Therefore, all portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit was placed in the Daily News-Record, Harrisonburg, Virginia, on September 29, 2004. EPA was sent a copy of the draft permit and notified of the public notice on September 28, 2004. The affected state of West Virginia was sent a copy of the public

notice on September 29, 2004. All persons on the Title V mailing list were also sent a copy of the public notice in e-mail dated September 29, 2004.

Public comments were accepted from September 29, 2004 to October 29, 2004. One comment was received. A Response to Comments document is included as Attachment G. EPA 45 day comment period ended on December 13, 2004.

ATTACHMENT A

CEDS Emission Inventory Report

ATTACHMENT B

Minor NSR Permit
(dated September 3, 1974)

ATTACHMENT C

Minor NSR Permit
(dated October 23, 1992)

ATTACHMENT D

Minor NSR Permit
(dated April 6, 2001)

ATTACHMENT E

Emission Calculations

ATTACHMENT F

Emission Calculations for CAM Applicability

ATTACHMENT G

Response to Comments Document